

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
KALAMAZOO DIVISION**

Lorie Bevins,

Plaintiff,

v.

Zenresolve, LLC
c/o The Corporation Company
40600 Ann Arbor Road East, Suite 201
Plymouth, MI 48170,

Defendant.

Case No.

COMPLAINT

Jury Demand Requested

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §§1331, 1337, 1367; and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff is a resident of the State of Michigan.
- 4- Plaintiff is a “consumer” as defined in the Fair Debt Collection Practices Act, 15 USC 1692 et seq. (“FDCPA”).
- 5- Plaintiff incurred a “Debt” as defined in the FDCPA.
- 6- Defendant is a company with its principal office in the State of Wyoming.
- 7- Defendant acquired the Debt after it was in default.
- 8- Defendant regularly attempts to collect, or attempts to collect, debts that it acquired after the same were in default.
- 9- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 10- At all times relevant, Defendant was a “debt collector” as defined in the FDCPA.

FACTS COMMON TO ALL COUNTS

11- On or around May 12, 2021, Defendant sent Plaintiff an email to collect a debt (the “Email”).

12- Upon information and belief, the Email was the first communication from Defendant to Plaintiff.

13- In the Email, Defendant failed to advise Plaintiff of her rights to dispute the Debt as required by 1692g.

14- The Email failed to state that it was a communication from a debt collector as required by 15 USC 1692(f)(11).

15- Defendant violated the FDCPA as detailed above.

16- Defendant damaged Plaintiff.

COUNT I

17- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

18- Defendant violated 15 USC § 1692e by engaging in false, deceptive, or misleading methods to collect a debt.

COUNT III

19- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

20- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, the Debt.

COUNT III

21- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

22- Defendant violated 15 USC § 1692f(11) by failing to notify Plaintiff that a communication was from a debt collector.

COUNT IV

23- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

24- Defendant violated 15 USC § 1692e(10) by making false representations during the collection of a debt.

JURY DEMAND

25- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

26- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

The Litigation Practice Group

By: /s/ Richard J. Meier

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